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Aug 10

Department of Energy  
Rocky Flats Field OfficeDUE  
DATE 9-21-94

## memorandum

ACTION Stiger

AUG 09 1994

EG&G  
ROCKY FLATS PLANT  
CORRESPONDENCE CONTROL

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ER:SRG/TLR:08174

Development of Recommended Actions for the Operable Unit No. 1 Corrective  
Measures Study/Feasibility StudySue Stiger, Associate General Manager  
Environmental Restoration Management  
EG&G Rocky Flats, Inc.

Technical Memorandum No. 10 (TM) "Development of Remedial Action Objectives" and TM 11 "Development and Screening of Remedial Action Alternatives" were not finalized and resubmitted to the agencies in order that we could meet the August 25, 1994 Interagency Agreement (IAG) milestone for submittal of the Draft Corrective Measures Study/Feasibility Study (CMS/FS) for Operable Unit No. 1 (OU 1). As a result, a number of key issues remain unresolved with the Environmental Protection Agency (EPA) and the Colorado Department of Public Health and Environment (CDPHE) and will be carried through to the Draft CMS/FS report.

The purpose of this letter is to request you to: 1) identify any potential key issues, 2) develop strategies (i.e., course of action) for mitigation of these issues, and 3) provide the Department of Energy (DOE) with a series of recommended or proposed actions for each issue. Several key issues can be identified from agency comments which have been received on TM 10 and TM 11, as well as issues that you feel may be critical from Phase II of the CMS/FS. Some examples of critical issues which may need strategy development *a priori* are:

- CDPHE request to screen and analyze remedial alternatives for each Individual Hazardous Substance Site (IHSS)
- Methods used to perform PRG calculations
- The use of MCLs in conducting the CMS/FS
- Defense of the Screening and the Detailed Analysis of Alternatives
- Proposal for Class III Ground Water Classification
- State Drinking Water Standards

Your recommendations should be accompanied by your reasoning and justifications based on any relevant information which may be required. Justification and the development of strategies will be particularly important for recommendations regarding dispute resolution, a request for stop work, or for a milestone extension request. We recognize that many issues may be tied to applicable or relevant and appropriate requirements (ARARs) and that

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DOE ORDER # 5400.1

ADMIN RECORD

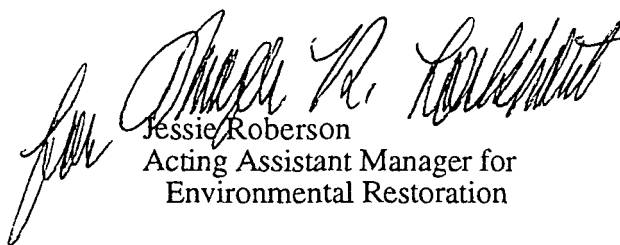
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your recommendations may need to be coordinated with progress by the ARARs development committee. We also recognize that critical logic ties to the development of the Proposed Plan and its presentation to the public are also critical issues which may need to be tied to this strategy development effort.

Beginning this effort at this time will substantially aid our ability and organization to confront many issues from both a technical and a legal standpoint. A report should be generated detailing the results from this effort and received by Rocky Flats Field Office by September 21, 1994. This date is important because schedule agreements with the agencies require them to present comments on the Draft CMS/FS by October 7, 1994. We would then have 14 calendar days to dispute an issue.

This request was discussed with your staff on July 25, 1994, and we will continue to informally discuss the status and progress of this effort with them. If you have any questions regarding this material, please contact Scott Grace of my staff at 966-7199.

  
Jessie Roberson  
Acting Assistant Manager for  
Environmental Restoration

cc:

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